

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MONIQUE GRIMES, as Personal
Representative of the Estate of
Damon Grimes, deceased,

Plaintiff,

v.

TROOPER MARK BESSNER,
TROOPER ETHAN BERGER,
and SGT. JACOB LISS,

Defendants.

No. 2:17-cv-12860

HON. GERSHWIN A. DRAIN

consolidated with
Case No. 17-cv-13580

Geoffrey N. Fieger (P30441)
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DEFENDANTS BERGER AND LISS'S
LAY AND EXPERT WITNESS LIST

Pursuant to the Court's September 20, 2018 amended scheduling order, Defendants Ethan Berger and Jacob Liss, by counsel, state the following as their witness list:

Plaintiff Monique Grimes and any other putative members of the Estate of Damon Grimes.

Defendant Ethan Berger

Defendant Jacob Liss

Defendant Mark Bessner

Family members, friends, and neighbors of Damon Grimes, including but not limited to the following:

- Steve Cajar
- Duane Campbell
- DQoune Grant
- Destiny Grimes
- Dezanique Grimes
- Dezjanai Grimes
- Sierra Hall
- John Hughes
- Charnasia Jones
- MoToya Jones
- Terronica Logan
- Ameia McBride
- Shyrel Denise Powell
- Shakirah Sims
- Gail Wiley

Agents and employees of Michigan Collegiate Middle and High School, including but not limited to the following:

- Mrs. Fodder
- Vergil Smith
- Mrs. Walter
- Russell Woodruff

Agents and employees of the Michigan State Police, including but not limited to the following:

- Jeff Amley
- Shannon Banner

John Beafore
Angela Bean
Nicole Bock
Matt Bolger
Marc Bonneau
Jeremy Brewer
Joseph Brodeur
Lt. Brown
James Bundshuh
Rebecca Carcone Cook
Beth Clark
Sgt. Corriveau
Roger Craig
Jeremy Cupp
Capt. Decker
Thomas Declercq
James Deline
Diondre Doaks
Neil Donohue
Jordan Enders
Jeff Frasier
Charlene Gilbert Warner
Mark Goff
Donovan Harden
Angela Hunt
Roger Hunt
Dave Jeffries
Brennen Kelly
Michael Klenner
Chris Kurish
Rebecca MacArthur
Brandon Maletta
Dan Martin
Michael McCarthy
Insp. Menna
Jonathan Meyer
Jeffrey Meyers
Greg Morenka

Jay Morningstar
Kevin Lucidi
Juiwana Pickett
Jeff Polny
Michelle Ponschke
Todd Poppema
Denise Powell
Nolan Pryzbello
Fahad Qureshi
Amanda Roberts
Even Rzeppa
Richard Sanchez
Kristy Sekedat
Rick Sekely
Barry Schrader
Michael Shaw
Mike Sherry
Scott Singleton
Dave Skeans
James Smiley
Lisa Smith
Sgt. Sullivan
Karl Suni
Kathaleen Szczegielniak
Tpr. Terry
Matthew Unterbrink
Tracey Walton
Casey Wyzlik
James Young
Michael Zarate
Greg Zarotney

Agents and employees of the Detroit Police Department, including but not limited to the following:

Hamad Abed
Lawrence Addison
Regina Allen
Cameron Boersma

Joseph Borkowski
Kimberly Buckner
Joshua Davis
Marc DeLuca
J. Drake
Todd Ebby
Owen Hall
Nicholas Haupt
Enrique Jackson
Sgt. Piel
Dejonte Rice
Jamar Rickett
Emily Stephenson
Lance Sullivan
Sequoia Turner
Aubrey Wade
Paul Warner
Jalen Williams
Calvin Wilson
L. Wilson
Daran Zhoud

Agents and employees of EMS, Detroit Fire Department, or any other persons who responded to the scene of the incident, including but not limited to the following:

Jamal Carver

Agents and employees of any dispatching authority involved in this case, including but not limited to the following:

Dispatcher Haynesworth
Dispatcher Kenyon
Dispatcher McDaniels

Agents and employees of the Office of Wayne County Prosecutor, including but not limited to the following:

Robert Donalson
Maria Miller
Matthew Penney

Sara Young

Agents and employees of the Wayne County Medical Examiner, including but not limited to the following:

Sarah Avedschmidt
Anna Harris Holmes
Dr. El-Shazly
Reginald Harvel
Jerrail Mantiv
David Moons
Carl J. Schmidt

Any forensic toxicologist involved in this case, including but not limited to the following:

Daniel S. Isenschmid

Agents and employees of St. John Hospital, including but not limited to the following:

Deborah Crall
Jennifer Destross
Dr. Janka
S. Jethzu
Stacy Jutzy
Samuel Sanders
Amrita Manasa Vempati

Agents and employees of AXON Enterprise/Taser International, including but not limited to the following:

Bryan Chiles

Agents and employees of Full Throttle Sports, including but not limited to the following:

Chad Cook
Doug Sandberg

Agents and employees of Area Towing, including but not limited to the following:

Dan Darga

Agents and employees of Embassy Coney Island, including but not limited to the following:

Jose Merditaj

Agents and employees of Canfield Equipment Service, including but not limited to the following:

Nate Gibson

Agents and employees of Children's Advocacy Center, including but not limited to the following:

Cynthia R. Stockard

Agents and employees of Compassion Funeral Home, including but not limited to the following:

Bishop Ruffin

Employees, adjusters, or agents of any insurance company that responded to a claim arising out of this case.

Any witness referred to in the investigatory materials.

Any witness identified in criminal proceedings related to this case.

Any individual who may have been involved in any investigation related to this case.

Any individual who provided medical care or other treatment to Damon Grimes.

Any family member, neighbor, or friend of Damon Grimes who may be a witness.

Any individual who may have personal knowledge of Plaintiff's claims of economic and non-economic damages. These individuals may include Plaintiffs' family members, friends, doctors and other healthcare professionals who may have treated him, counselors and other mental

healthcare professionals who may have treated him, neighbors, financial advisors, employees, clients, and others.

Any witness identified on another party's witness lists, whether called at trial or not.

Experts to be named and retained, including but not limited to the following areas of expertise:

Audio and Video

Childhood Development

Criminology/Police Practices/Procedures/Use of Force:

Daniel Kennedy, PhD

Crash Reconstruction

Damages/Economics:

Frank Stafford, PhD

Engineering/Mechanical

Medical Experts

Pathology

Psychology

Witnesses that may be ascertained through discovery or investigation.

All necessary records custodians and witnesses who can provide testimony to authenticate and admit exhibits, including but not limited to agents and employees of the following:

AT&T

Area Towing

AXON Corporation/Taser International

Canfield Equipment Company

Compassion Funeral Home

Detroit Police Department

Fisheye Camera

Full Throttle Sports

Internal Revenue Service

Medicare/Medicare

Michigan Collegiate Middle and High School

Michigan Department of Attorney General

Michigan Department of State Police

Michigan Department of Treasury
Michigan State Police Troopers' Association
Office of Wayne County Prosecutor
Social Security Administration
Sprint
St. John Hospital and Medical Center
State of Michigan
T-Mobile
Verizon
Wayne County District and Circuit Courts
Wayne County Medical Examiner

Any Rule 30(b)(6) witnesses identified in this case.

Any rebuttal witnesses.

Defendants reserve the right to amend and/or supplement this list.

Respectfully submitted,

BILL SCHUETTE
Attorney General

/s/ John G. Fedynsky
John G. Fedynsky (P65232)
Assistant Attorney General
Attorney for Defendants Berger
and Liss
Complex Litigation Division
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Lansing, MI 48909
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fedynskyj@michigan.gov

Dated: December 18, 2018

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of December, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such.

/s/John G. Fedynsky

John G. Fedynsky

Assistant Attorney General

Attorney for Defendants Berger
and Liss